

FEDERAL ELECTION COMMISSION
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FIRST GENERAL COUNSEL'S REPORT

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ELECTION CYCLE: 2016
EXPIRATION OF SOL: 11/01/2019 to 03/27/2020

COMPLAINANT: Brad Woodhouse,
American Democracy Legal Fund

RESPONDENTS: Mike Huckabee
America Takes ACTION, Inc.

RELEVANT STATUTES: 52 U.S.C. § 30118(a)¹
11 C.F.R. § 114.2(a)
11 C.F.R. § 114.2(d)
11 C.F.R. § 100.72(a)

INTERNAL REPORTS CHECKED: Disclosure Reports

AGENCIES CHECKED: None

I. INTRODUCTION

This matter arises from an allegation that Mike Huckabee used America Takes ACTION, Inc. ("ATA"), a 501(c)(4) social welfare organization, to test the waters of a 2016 Presidential campaign. Specifically, the Complaint alleges that Huckabee violated 52 U.S.C. § 30118(a) by accepting in-kind corporate contributions from ATA in the form of salary payments to employees who performed testing-the-waters activities on his behalf, and that ATA violated

¹ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act") was transferred from Title 2 to new Title 52 of the United States Code.

52 U.S.C. § 30118(a) by making such in-kind contributions. The Respondents deny the allegations and assert that ATA only performed work that promotes the organization's positions on certain public policy issues.

As discussed below, there is no available information tending to show that ATA paid for any potential testing-the-waters activity. Therefore, we recommend that the Commission find no reason to believe that Huckabee violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 100.72(a), find no reason to believe that ATA violated 52 U.S.C. § 30118(a), and close the file in this matter.

II. FACTS

In June 2008, ATA was incorporated in Arkansas under its former name, Vertical Politics Institute, Inc., as a non-profit corporation organized under section 501(c)(4) of the Internal Revenue Code with the stated purpose of educating Americans about economic, social, education, tax, national defense, and other public policy issues.² In April 2014, Vertical Politics Institute, Inc. changed its name to America Takes ACTION, Inc. but retained the same statement of its official purpose.³ Since at least that time, Mike Huckabee, the former governor of Arkansas, has been associated with the organization.⁴ Neither of the Respondents explains Huckabee's relationship with ATA or states whether he has an official role in the organization,

² Huckabee Resp., Ex. 1 (articles of incorporation); ATA Resp., Ex. 1 (same).

³ Huckabee Resp., Ex. 2 (articles of amendment); ATA Resp., Ex. 2 (same).

⁴ The homepage of ATA's website consists of a Huckabee quote and a paragraph labeled "Welcome from Mike Huckabee." America Takes Action, <http://www.americatakesaction.com/> (last visited May 5, 2015). Images of Huckabee adorn each page on the site and there are graphical links, without textual descriptions, to his personal social media accounts. *Id.* (When accessed on June 8, 2015, those social media accounts were dedicated almost exclusively to his current Presidential campaign.) In April 2015, ATA released three videos in which Huckabee discusses his policies on topics such as the economy, immigration, and national security. See America Takes Action – YouTube, <https://www.youtube.com/channel/UCBBCrZ-mOnqu77fuTFPkSgA> (last visited May 5, 2015).

1 yet Huckabee appears to speak on behalf of ATA in his Response.⁵ In addition, the Respondents
2 specifically deny that Huckabee "recently created" ATA, but a press release cited in Huckabee's
3 Response describes ATA as Huckabee's "newly formed C4."⁶ Moreover, ATA's website refers
4 to Huckabee as its founder but does not state whether he "founded" ATA by incorporating
5 Vertical Politics Institute, Inc. in June 2008 or by changing the organization's name in April
6 2014.⁷

7 Following an unsuccessful campaign for the Republican Presidential nomination in 2008,
8 Huckabee became the host of a talk show on Fox News Channel. On November 12, 2014, the
9 *Washington Post* published an article discussing Huckabee's apparent efforts to rebuild his
10 political team and prepare for a 2016 Presidential campaign.⁸ Sarah Huckabee, his daughter and
11 political confidante, confirmed that his "heart is into it" and that he "is personally engaged and
12 more aggressive in taking on meetings."⁹ However, according to the article, Huckabee's contract
13 with Fox News Channel would not allow him to remain on the air if he formed an exploratory
14 committee or demonstrated serious intent to run for public office.¹⁰ Based on interviews with
15 unnamed sources described as "Republicans familiar with Huckabee's efforts," the article claims

⁵ See Huckabee Resp. at 2-3. For instance, Huckabee states that "[ATA] undertakes and engages in activities in furtherance of its stated mission that are entirely appropriate for, and consistent with, its tax status," and describes ATA's retention of certain independent contractors. *Id.* at 2. In addition, Huckabee attached copies of ATA's articles of incorporation and articles of amendment. *Id.*, Ex. 1; Ex. 2.

⁶ Compare Huckabee Resp. at 2; ATA Resp. at 2, with Press Release, Gov. Mike Huckabee and Penny Nance Announce "Stand with Israel Rally," <http://www.rallyforisrael.com/press-room>.

⁷ See About – America Takes Action, <http://www.americatakesaction.com/about> (last visited May 5, 2015).

⁸ Tom Hamburger & Robert Costa, *Mike Huckabee Rebuilds Political Team with Eye on Another Presidential Run*, WASH. POST, Nov. 12, 2014, http://www.washingtonpost.com/politics/mike-huckabee-rebuilds-political-team-with-eye-on-another-presidential-run/2014/11/12/8cb28ccc-69b3-11e4-b053-65cea7903f2e_story.html.

⁹ *Id.*

¹⁰ *Id.*

1 that Huckabee used ATA to prepare for a potential campaign covertly while still hosting his
2 show.¹¹ In an interview with the *Post* ahead of the article's publication, Huckabee stated, "I have
3 to be very careful about this . . . I am not doing anything official at this point."¹² In response, the
4 vice president for programming at Fox News Channel said that the network would "tak[e] a
5 serious look" at Huckabee's political activity.¹³ Alice Stewart, one of Huckabee's political
6 associates and an apparent independent contractor retained by ATA, denied the article's claim
7 that ATA served as a precursor to a campaign staff, and stated that ATA is an "advocacy group
8 that allows [Huckabee] to focus on issues that are important to him."¹⁴

9 Huckabee left Fox News Channel in January 2015 to concentrate on a potential
10 Presidential campaign.¹⁵ On the last episode of his show, he stated, "[t]here's been a great deal
11 of speculation as to whether I would run for president. And if I were willing to absolutely rule
12 that out, I could keep doing this show. But I can't make such a declaration."¹⁶ Several months
13 later, in March 2015, Huckabee formed an official exploratory committee, Prosperity for All
14 Fund, Inc. ("PFAF"), and promptly notified the Commission.¹⁷ On May 5, 2015, Huckabee
15 publicly announced his candidacy for the 2016 Republican Presidential nomination.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ Gavin Lesnick, *Huckabee Weighing Presidential Run*, *Newspaper Reports*, ARK. DEMOCRAT-GAZETTE, Nov. 12, 2014, <http://www.arkansasonline.com/news/2014/nov/12/huckabee-weighing-presidential-run-newspaper-report/>. The Complaint states that Alice Stewart was an ATA employee but the Respondents both assert that Stewart was retained as an independent contractor. *Compare* Compl. at 3, *with* Huckabee Resp. at 2; ATA Resp. at 2.

¹⁵ *See* Huckabee Resp. at 3.

¹⁶ Associated Press, *Huckabee Leaving Fox News to Mull 2016 Presidential Campaign*, NBC NEWS, Jan. 4, 2015, <http://www.nbcnews.com/politics/politics-news/huckabee-leaving-fox-news-mull-2016-presidential-campaign-n279501>.

¹⁷ *See* Huckabee Supp. Resp. at 1 (Apr. 1, 2015).

1 The Complaint asserts that Huckabee created ATA with the "veiled purpose" of planning
2 his 2016 Presidential campaign, and that ATA operated as Huckabee's "exploratory committee
3 in disguise."¹⁸ According to the Complaint, ATA employed several of Huckabee's "closest
4 advisors" and served as an "employment perch" for his forthcoming campaign staff.¹⁹ In
5 addition, the Complaint claims that ATA's employees were "compensated by ATA to explore
6 the feasibility of [Huckabee's] candidacy for president" and, in particular, to conduct a search for
7 a possible campaign headquarters.²⁰ Consequently, the Complaint alleges that Huckabee
8 received prohibited in-kind corporate contributions from ATA when it paid employees to
9 perform testing-the-waters activities on his behalf.²¹

10 In his Response, Huckabee acknowledges that he tested the waters of a 2016 Presidential
11 campaign ahead of forming an official exploratory committee but asserts that ATA did not fund

¹⁸ Compl. at 1, 4 (Dec. 4, 2014).

¹⁹ *Id.* at 3. The Complaint identifies four individuals with political connections to Huckabee who purportedly worked for ATA — Chip Saltsman, his 2008 Presidential campaign manager; Alice Stewart, a 2008 campaign staffer; Bob Wickers, a political strategist; and Sarah Huckabee, his daughter and "political confidante." *Id.* Huckabee acknowledges that Saltsman, Ms. Huckabee, and Stewart "have all counseled [him] in the past, and continue to do so today" and that "each has been involved in a variety of [his] activities." Huckabee Resp. at 2. He does not explain his relationship with Wickers but asserts that Wickers was not paid by ATA. *Id.* at 2. On May 7, 2015, Huckabee named each of the four to his campaign team in the positions of campaign manager, senior advisor, pollster and media strategist, and communications director. News Release, *Gov. Huckabee Announces National Campaign Team*, <http://www.p2016.org/huckabee/huckabee050715pr.html>.

According to the Respondents, these individuals were not official ATA employees. Rather, three of the four received payments from ATA as independent contractors. *See* Huckabee Resp. at 5, 2; ATA Resp. at 3. Huckabee asserts that Ms. Huckabee and Stewart were independent contractors, Saltsman was both an independent contractor and a board member, and Wickers was not paid by ATA in any capacity. Huckabee Resp. at 2.

²⁰ *Id.* at 1, 4. The alleged search for a possible campaign headquarters was one of three specific activities mentioned in the Complaint, but the only one that involved alleged payments from ATA. The other two are meetings with wealthy Republican donors and an international trip with pastors and religious leaders from "early primary states." *Id.* at 2. The donor meetings may have been testing-the-waters activities under the Commission's regulations assuming, as the Complaint alleges, that their purpose was to "gauge [the donors'] interests in his candidacy." *Id.* In contrast, the Complaint says nothing of a political purpose with respect to the international trip. Regardless of whether the donor meetings and international trip were testing-the-waters activities, however, the Complaint does not allege that ATA funded these activities.

²¹ *Id.* at 1.

1 any related expenses.²² Huckabee represents, as of the date of his Response, that his testing-the-
2 waters activities were not "extensive," but limited to speaking with "individuals who have
3 advised and/or supported him in the past."²³ Further, he states that his activities did not require
4 funding.²⁴ In addition, Huckabee denies that ATA conducted a search for a possible campaign
5 headquarters.²⁵ Finally, Huckabee argues that the Complaint "presents no actual evidence in
6 support of its speculation," and requests that the Commission dismiss the matter.²⁶

7 In its Response, ATA denies that it funded Huckabee's testing-the-waters activities and
8 asserts that it only paid its employees and contractors to educate citizens about the "conservative
9 public policy positions and issues that ATA exists to promote."²⁷ Moreover, ATA denies that it
10 conducted a search for Huckabee's possible campaign headquarters but acknowledges possessing
11 a lease for "certain property" in Little Rock that it intended to assign to Huckabee's exploratory
12 committee.²⁸ Finally, ATA argues that the Complaint's allegations are "vague, speculative, and
13 lack any evidentiary support," and requests that the Commission dismiss the matter.²⁹

14 III. ANALYSIS

15 The Act prohibits any corporation organized by authority of any law of Congress from
16 making a contribution, and correspondingly prohibits any candidate, political committee, or other

²² Huckabee Resp. at 3 (Feb. 3, 2015).

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.* at 4.

²⁶ *Id.* at 5-6.

²⁷ ATA Resp. at 2-3 (Mar. 27, 2015).

²⁸ *Id.* at 3.

²⁹ *Id.* at 4.

1 person from knowingly accepting or receiving a corporate contribution.³⁰ A contribution
2 includes any "direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or
3 any services, or anything of value" made in connection with a Federal election.³¹ The
4 Commission's regulations interpret the term "anything of value" to include all in-kind
5 contributions.³² Moreover, payment of "compensation for the personal services of another
6 person if those services are rendered without charge to a political committee for any purpose" is
7 considered a contribution.³³

8 An individual becomes a candidate if he or she receives contributions or makes
9 expenditures in excess of \$5,000, or consents to another doing so on his or her behalf.³⁴ The
10 Commission's regulations create a limited exception to the definitions of contribution and
11 expenditure — and therefore to the \$5,000 candidacy threshold — to allow individuals to
12 conduct certain activities to evaluate a potential candidacy (i.e., to "test the waters").³⁵ The
13 regulations define testing the waters as those activities "conducted to determine whether an
14 individual should become a candidate," and include, but are not limited to, conducting a poll,
15 telephone calls, and travel.³⁶ Funds received or payments made solely for this purpose are not

³⁰ 52 U.S.C. § 30118(a); *see* 11 C.F.R. § 114.2(a), (d) (same).

³¹ 52 U.S.C. § 30118(b)(2) (does not include a loan of money by a bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business); *see id.* § 30101(8)(A).

³² 11 C.F.R. § 100.52(d)(1).

³³ *Id.* § 100.54 (does not include legal and accounting services).

³⁴ 52 U.S.C. § 30101(2); *see* 11 C.F.R. § 100.3(a) (same).

³⁵ *See* 11 C.F.R. §§ 100.72(a), 100.131(a).

³⁶ *Id.*

1 contributions or expenditures, but are nonetheless still subject to the limitations and prohibitions
2 of the Act.³⁷

3 As a 501(c)(4) corporation, ATA is prohibited from making contributions in connection
4 with a federal election and, as an individual testing the waters of a federal election, Huckabee
5 was prohibited from knowingly accepting contributions prohibited by the Act. The Complaint
6 alleges that Huckabee used ATA to secretly test the waters of a 2016 Presidential campaign and,
7 consequently, that ATA made in-kind corporate contributions to Huckabee by paying employees
8 to perform testing-the-waters activities on his behalf.³⁸ The available information, however,
9 does not afford a reasonable basis to draw such a conclusion.

10 The relevant factual information presented in the Complaint is limited to: (1) conclusory
11 assertions about ATA's purpose made in a news article that, in turn, does not provide specific
12 information to support its claims; (2) alleged facts regarding Huckabee's association with ATA
13 that, even if true, would not demonstrate a potential violation of the Act; and (3) an
14 unsubstantiated claim that ATA conducted a search for a possible campaign headquarters. In
15 short, this Office has no information tending to show a nexus between ATA and any testing-the-
16 waters activity that could support a finding of reason to believe.³⁹

³⁷ *Id.* When an individual becomes a candidate, any such funds received or payments made become contributions or expenditures subject to the reporting requirements of the Act and are to be reported as such on the first disclosure report filed by the candidate's authorized committee. *Id.* § 101.3.

³⁸ Compl. at 1.

³⁹ See MUR 5260 (Talent for Senate) (no reason to believe that a candidate used a state leadership PAC to secretly test the waters when the allegations were based primarily on the candidate's association with the PAC and, moreover, the Complaint did not provide specific instances of testing-the-waters activity conducted by the PAC); see also Statement of Reasons, Comm'rs Mason, Sandstrom, Smith, & Thomas at 3, MUR 4960 (Hillary Clinton for U.S. Senate Exploratory Committee) (purely speculative charges do not form an adequate basis to find reason to believe that a violation of the Act has occurred).

1 The Complaint recites general assertions made in a news article by individuals described
2 as Republicans close to Huckabee who are familiar with his activities. They do not describe
3 specific identifiable activity of the parties, but instead simply characterize the nature of ATA in
4 conclusory terms — an “employment perch” for Huckabee’s political team, a “landing spot for
5 staff and money,” and “designed to allow [Huckabee] to retain his Fox News contract.”⁴⁰
6 General characterizations of ATA’s purpose, without more, do not afford a reasonable basis to
7 conclude the Respondents may have violated the Act or Commission regulations.

8 In addition, the Complaint emphasizes Huckabee’s association with ATA, but this
9 information, even if true, does not give rise to a violation of the Act and the Commission’s
10 testing-the-waters regulations. Although Huckabee may have used ATA as a platform to
11 maintain his public image and advance certain issues, the Complaint provides no information
12 suggesting he also used ATA to test the waters of a campaign.⁴¹ Nor does Huckabee’s stated
13 association with four alleged ATA employees support an inference that they engaged in testing-
14 the-waters activities in their capacity as ATA employees. Even assuming these individuals
15 engaged in exploratory activities for Huckabee — and we are aware of no information
16 suggesting they did — the Complaint provides no factual basis to conclude that they acted on
17 ATA’s behalf or were compensated by ATA when doing so.⁴²

⁴⁰ Hamburger & Costa, *supra* note 8.

⁴¹ As a public figure and politician, Huckabee’s association with a social welfare organization is not suggestive of a testing-the-waters violation in itself. *See* First Gen. Counsel’s Rpt. at 26-27, MUR 5260 (Talent for Senate) (the fact that a state leadership PAC served as a candidate’s “platform” to “keep up his political profile and support Republican candidates and causes,” does not indicate that the PAC assisted with the candidate’s testing-the-waters or federal election activities).

⁴² The facts recited in the news article offer no material support for drawing an inference that Huckabee’s associates performed testing-the-waters activities in their capacity as ATA employees or contractors. According to the article, sources claim that Saltsman and Wickers conducted limited exploratory work for Huckabee approximately a year or more before the Complaint was filed — they reportedly gave Huckabee a list of exploratory

1 Furthermore, there is no available information tending to suggest that ATA retained
2 Huckabee's associates to further his efforts to test the waters of a Presidential campaign.
3 Although the Respondents did not provide information to demonstrate that Huckabee's
4 associates performed *bona fide* work for ATA, they deny the Complaint's allegations.
5 Moreover, the Complaint's mere reliance on the claimed close association of these individuals
6 with Huckabee provides no factual, credible grounds to conclude that ATA's decision to retain
7 them was not made irrespective of Huckabee's potential candidacy.⁴³

8 The sole specific allegation in the Complaint that ATA engaged in testing-the-waters
9 activity relates to the claim that ATA conducted a search for space in Little Rock, Arkansas to
10 serve as a possible Huckabee campaign headquarters.⁴⁴ However, the news article on which the
11 Complaint relies for that allegation is ambiguous on the question of ATA's role in the alleged

objectives around July 2013, and Saltsman allegedly helped Huckabee to "map[] out a run . . . in order to keep up with his potential rivals" at the same time or soon thereafter. *Hamburger & Costa, supra* note 8. There is no mention of a connection between this activity and ATA. Moreover, Huckabee avers that Wickers was not paid by ATA. *See supra* note 19.

⁴³ See MUR 5248 (Ralph Reed) at 18-21 (finding no reason to believe that a corporation would not have retained a political consulting firm but for a candidate's testing the waters of a Presidential election because, *inter alia*, the corporation "flatly denie[d]" the accusation, there was evidence the consulting firm performed substantial *bona fide* work, the corporation first approached another party to perform the work, and there was an ongoing relationship between the corporation and consulting firm); *see also* Statement of Reasons, Comm'rs McDonald, Mason, Sandstrom, Smith, & Thomas, at 1-3 MUR 4944 (PNC Mortgage Corp.) (explaining that, where there is insufficient nexus between a transaction and campaign, or where a transaction involves payments that would have been made irrespective of candidacy, the transaction is not made in connection with a Federal election and therefore not a contribution or expenditure).

⁴⁴ Although the search for a campaign headquarters was the only factual allegation asserted in the Complaint concerning a potential in-kind contribution from ATA to Huckabee in the form of a testing-the-waters expenditure, we note that the very video by which Huckabee announced his candidacy for President, originally released by his official exploratory committee, appears to contain non-public footage used in three videos released by ATA in April 2015. Furthermore, Huckabee's principal campaign committee does not appear to have reported any payments in connection with acquiring the raw footage from these videos. Because these facts postdate the Complaint and the Responses and do not relate to the allegations in the Complaint regarding testing-the-waters activity — indeed, the exploratory committee, the entity that acquired and used the footage on Huckabee's behalf, did not exist when the Complaint was filed — we make no recommendation concerning the use of apparently non-public ATA video footage in the exploratory committee's announcement video for Huckabee's candidacy.

1 search.⁴⁵ Nonetheless, even accepting that the article addresses the issue as the Complaint
2 interprets it, the allegation does not afford any reasonable basis to conclude that ATA sought to
3 obtain a campaign headquarters for Huckabee as alleged.

4 As a factual matter, Huckabee specifically denies that either he or any of his advisors
5 searched for office space.⁴⁶ Similarly, ATA denies that it conducted a search on Huckabee's
6 behalf.⁴⁷ Additionally, Alice Stewart told the *Arkansas Democrat-Gazette*, in direct response to
7 the *Post* article, "I'm not aware of people searching for any office space in Little Rock."⁴⁸
8 Indeed, the only available information that arguably tends to support the allegation is ATA's
9 subsequent assignment of a lease for office space in Little Rock, Arkansas to Huckabee's official
10 exploratory committee around April 2015.⁴⁹ Nonetheless, the fact of that assignment itself
11 provides no basis to infer that ATA conducted a search for office space to lease in its own name
12 but with the intent to deliver it to Huckabee at a later time via assignment to use as a campaign
13 headquarters — a necessary element for receipt of an in-kind contribution.⁵⁰ To the contrary,

⁴⁵ Based on the *Post* article, the Complaint alleges that "[ATA] employees are engaged in . . . exploratory efforts . . . including looking for a possible campaign headquarters." Compl. at 4. That article, however, presents a more ambiguous connection between ATA and the alleged search. In the third paragraph, the article states that ATA has begun to serve as an "employment perch" for Huckabee's campaign team and has hired a number of experienced campaign operatives. Hamburger & Costa, *supra* note 8. In the subsequent paragraph, the article states that "[a]dvisers are already scouting real estate in Little Rock for a possible presidential campaign headquarters." *Id.* The article does not indicate that these advisors were associated with or compensated by ATA.

⁴⁶ Huckabee Resp. at 4.

⁴⁷ ATA Resp. at 3.

⁴⁸ Huckabee Resp. at 4.

⁴⁹ ATA Resp. at 3.

⁵⁰ *Id.* In its Response, ATA states its intention to make an agreement with PFAF, Huckabee's exploratory committee, promising that PFAF could reassign the lease back to ATA in the event that Huckabee decided not to run for President. This agreement would arguably provide "something of value" to PFAF since it did not have to allocate funds to cover the duration of the lease. However, there is no information to suggest that ATA made the agreement to benefit Huckabee's campaign rather than for some *bona fide* purpose. See, e.g., MUR 5260 (Talent for

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1 ATA voluntarily disclosed the assignment to the Commission and stated that Huckabee's
2 exploratory committee would pay all costs associated with the lease and reimburse ATA for the
3 security deposit.⁵¹

4 In summary, while there was undeniably a connection between ATA and Huckabee's
5 efforts to maintain his public image and promote certain policy issues, there is no information in
6 the Complaint, and we are aware of no other information available to the Commission, tending to
7 show that ATA engaged in efforts on Huckabee's behalf to test the waters of a Presidential
8 campaign. The Complaint recites conclusory assertions about ATA's supposed exploratory
9 purpose, but does not describe any activity performed or funded by ATA, such as conducting a
10 poll, making telephone calls, or funding travel expenses, that could potentially qualify as testing-
11 the-waters activities under the Commission's regulations. We therefore recommend that the
12 Commission find no reason to believe that Mike Huckabee violated 52 U.S.C. § 30118(a) and 11
13 C.F.R. § 100.72(a), and find no reason to believe that America Takes ACTION, Inc. violated 52
14 U.S.C. § 30118(a).

15 **IV. RECOMMENDATIONS**

- 16 1. Find no reason to believe that Mike Huckabee violated 52 U.S.C. § 30118(a) and
17 11 C.F.R. § 100.72(a).
- 18 2. Find no reason to believe that America Takes ACTION, Inc. violated 52 U.S.C.
19 § 30118(a).
- 20 3. Approve the attached Factual and Legal Analyses.
- 21 4. Approve the appropriate letters.

Senate), First Gen. Counsel's Rpt. at 26-27 (the fact that a candidate's state leadership PAC "moved out of its office space to make way" for his campaign did not itself suggest a violation of the Act).

⁵¹ See Huckabee for President, Inc. July Quarterly Rpt. at 527 (July 15, 2015) (disbursement of \$7,624.58 to America Takes Action for "Reimbursement of Rental Deposit" made on April 15, 2015).

5. Close the file.

7/28/2015
Date

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